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6 *Attorneys for Defendants*
7 *Bocci Engineering, LLC and*
Employers One Source Group, Inc.

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 AJULENA BARNES,

Case No. 2:17-cv-00101-APG-PAL

13 Plaintiff,

14 vs.

15 BOCCI ENGINEERING, LLC, a limited
liability company; EMPLOYERS ONE
16 SOURCE GROUP, INC., a foreign
corporation; AND DOES 1-50, inclusive,

**EMERGENCY REQUEST AND
STIPULATION AND ORDER TO
CONTINUE EARLY NEUTRAL
EVALUATION SESSION**

(SECOND REQUEST)

17 Defendants.
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19 Due to unforeseen circumstances arising from Hurricane Harvey and the impact it has had
20 on Defendants' ENE participants, the parties spoke and have agreed to stipulate to continue the
21 Early Neutral Evaluation ("ENE") Session currently scheduled for September 13, 2017 at 9:00 a.m.,
22 before the Honorable Magistrate Judge George Foley, Jr.

23 Specifically, this request is prompted by the effects of the catastrophic hurricane that hit the
24 southeastern part of Texas on or around August 25, 2017. Defendant BOCCI Engineering LLC's
25 Chief Executive Officer, Lianne Lami resides in Houston, Texas and was one of millions effected
26 by this unprecedeted natural disaster. As such, Ms. Lami is temporarily unable to travel from
27 Houston to Las Vegas to attend the ENE as her home has sustained immeasurable damages. The
28 Parties therefore respectfully request the ENE scheduled for September 13, 2017 be vacated, and

1 that a new ENE date be set for October 19, 2017 at 9:30 a.m., or as soon thereafter as the Court's
2 calendar will allow.

3 This stipulation and order is sought in good faith and not for the purpose of delay.

4 Dated this 5th day of September, 2017.

5 WATKINS & LETOFSKY, LLP

JACKSON LEWIS P.C.

6
7 /s/ Daniel R. Watkins

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/s/ Mahna Pourshaban

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13 Attorneys for Defendants
14 Bocci Engineering, LLC and
15 Employers One Source Group, Inc.

16 ORDER

17 IT IS SO ORDERED:

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29 UNITED STATES MAGISTRATE JUDGE

30 Dated: September 5, 2017

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32 4812-4701-2942, v. 2